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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Judge: Hon. Susan van Keulen

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Portions of Plaintiffs' Request for an Order to Show Cause re: Sanctions (Dkts. 429, 430) ("Motion").

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

| Document  | Text To Be Sealed  | Basis for Sealing Portion of Document  |
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| Plaintiffs' Request for Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct | <p>GRANTED as to the portions at:</p> <p>Request For an Order to Show Cause:</p> <p>Pages 1:11-12</p> <p>Main Motion:</p> <p>Pages 1:8-15, 1:20-21, 1:23, 1:25, 2:13, 2:22, 3:4, 3:7, 4:18-22, 5:8, 5:16, 5:25, 6:4, 6:6, 6:16, 6:21, 8:1-8, 8:12, 8:19, 9:14-24, 9:27, 10:9-10, 11:6, 11:21-23, 12:3-4, 13:16, 13:19, 13:22-23, 14:7-10 14:12, 14:20-21, 15:3, 15:7, 15:21, 16:12-14, 16:23, 17:22, 18:4, 18:22, 18:25, 19:6, 19:13</p> | <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p> |

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| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20 | Declaration of Mark C. Mao<br>in Support of Plaintiffs'<br>Order to Show Cause Motion | GRANTED as to the<br>portions at:<br><br>Pages 1:8-9, 1:12-15,<br>1:26-27, 2:3, 2:11, 2:17-<br>19, 2:23-26, 3:1, 3:12-14,<br>3:16-17, 3:20-28, 4:5,<br>4:8-10, 4:13-14, 4:16-17,<br>4:19-21, 5:5-6, 5:8, 5:10,<br>5:15, 5:18, 6:2, 6:5-6,<br>6:10, 6:13, 6:19-20, 6:23,<br>7:4, 7:8, 7:13, 7:15-16 | The information requested to be<br>sealed contains Google's highly<br>confidential and proprietary<br>information regarding highly<br>sensitive features of Google's<br>internal systems and operations,<br>including various types of Google's<br>internal projects, data signals and<br>logs and their proprietary<br>functionalities, as well as internal<br>metrics, that Google maintains as<br>confidential in the ordinary course<br>of its business and is not generally<br>known to the public or Google's<br>competitors. Such confidential and<br>proprietary information reveals<br>Google's internal strategies, system<br>designs, and business practices for<br>operating and maintaining many of<br>its important services, and falls<br>within the protected scope of the<br>Protective Order entered in this<br>action. See Dkt. 81 at 2-3. Public<br>disclosure of such confidential and<br>proprietary information could affect<br>Google's competitive standing as<br>competitors may alter their systems<br>and practices relating to competing<br>products. It may also place Google<br>at an increased risk of cybersecurity<br>threats, as third parties may seek to<br>use the information to compromise<br>Google's internal practices relating<br>to competing products. |
| 21<br>22<br>23<br>24<br>25<br>26<br>27<br>28  | Mao Decl., Exhibit 1<br>(GOOG-BRWN-00845639)  | GRANTED as to the<br>portions at:<br><br>Page 2  | The information requested to be<br>sealed contains Google's highly<br>confidential and proprietary<br>information regarding highly<br>sensitive features of Google's<br>internal systems and operations,<br>including various types of Google's<br>internal projects and their<br>proprietary functionalities, that<br>Google maintains as confidential in<br>the ordinary course of its business<br>and is not generally known to the<br>public or Google's competitors.<br>Such confidential and proprietary   |

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|  |  | information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.   |
| Mao Decl., Exhibit 2<br>(GOOG-BRWN-00845596) | GRANTED as to the portions at:<br><br>Page 1 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity |

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|  |  | threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 3<br>(GOOG-BRWN-00845423) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Mao Decl., Exhibit 4<br>(GOOG-BRWN-00023909) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding its employees, their organizational division, manager, and title, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.  |

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|  |  | Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may attempt to contact and/or hire these employees relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 8 (excerpts from the December 2, 2021 deposition of Google employee Chris Liao) | GRANTED as to the portions at:<br><br>122:24, 123:2, 123:8, 123:22-25, 124:1-26, 125:1-12, 126:6, 126:8, 126:12, 126:23, 127:9-25, 128:1-17, 129:3, 131:18-25, 132:1-25, 133:1-25, 134:1-20, 138:10, 138:19, 139:7, 139:18, 139:24, 140:5, 140:21, 141:13-25 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and |

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|   |  | practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 9<br>(GOOG-BRWN-00845312)  | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Mao Decl., Exhibit 10<br>(GOOG-BRWN-00845569) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's   |

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|   |   | internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Mao Decl., Exhibit 11<br>(GOOG-BRWN-00845277) | GRANTED as to the<br>portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls   |



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|   |  | within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.   |
| Mao Decl., Exhibit 12<br>(GOOG-CABR-05144884) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |

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| <p>1 Mao Decl., Exhibit 14<br/>(GOOG-CABR-04324934)</p>  | <p>2 GRANTED as to the<br/>portions at:</p> <p>3 Entirety</p>   | <p>4 The information requested to be<br/>sealed contains Google's highly<br/>confidential and proprietary<br/>information regarding highly<br/>sensitive features of Google's<br/>internal systems and operations,<br/>including various types of Google's<br/>internal projects and their<br/>proprietary functionalities, as well<br/>as internal metrics and investigation<br/>into financial impact of certain<br/>features, that Google maintains as<br/>confidential in the ordinary course<br/>of its business and is not generally<br/>known to the public or Google's<br/>competitors. Such confidential and<br/>proprietary information reveals<br/>Google's internal strategies, system<br/>designs, and business practices for<br/>operating and maintaining many of<br/>its important services, and falls<br/>within the protected scope of the<br/>Protective Order entered in this<br/>action. See Dkt. 81 at 2-3. Public<br/>disclosure of such confidential and<br/>proprietary information could affect<br/>Google's competitive standing as<br/>competitors may alter their systems<br/>and practices relating to competing<br/>products. It may also place Google<br/>at an increased risk of cybersecurity<br/>threats, as third parties may seek to<br/>use the information to compromise<br/>Google's internal practices relating<br/>to competing products.</p> |
| <p>21 Mao Decl., Exhibit 15<br/>(GOOG-BRWN-00845477)</p> | <p>22 GRANTED as to the<br/>portions at:</p> <p>23 Entirety</p> | <p>24 The information requested to be<br/>sealed contains Google's highly<br/>confidential and proprietary<br/>information regarding highly<br/>sensitive features of Google's<br/>internal systems and operations,<br/>including various types of Google's<br/>internal projects, data signals and<br/>logs and their proprietary<br/>functionalities, as well as internal<br/>metrics, that Google maintains as<br/>confidential in the ordinary course<br/>of its business and is not generally</p>  |

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|   |  | known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.   |
| Mao Decl., Exhibit 16<br>(GOOG-BRWN-00845481) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect |

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|   |   | Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 17<br>(GOOG-BRWN-00845437) | GRANTED as to the<br>portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Mao Decl., Exhibit 18<br>(GOOG-CABR-05280756) | GRANTED as to the<br>portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's   |

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|   |  | internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Mao Decl., Exhibit 19 (excerpts of Google's Responses and Objections to Plaintiffs' Ninth Set of Interrogatories) | GRANTED as to the portions at:<br>4:13 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal log, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective   |

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|  |   | Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 20 (February 23, 2022 email exchange between counsel for Plaintiffs and counsel for Google) | GRANTED as to the portions at:<br><br>Pages 1-3 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |

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| 2  | Mao Decl., Exhibit 21<br>(GOOG-CABR-05757329) | GRANTED as to the<br>portions at: | The information requested to be<br>sealed contains Google's highly<br>confidential and proprietary<br>information regarding highly<br>sensitive features of Google's<br>internal systems and operations,<br>including various types of<br>Google's internal projects, data<br>signals and logs and their<br>proprietary functionalities, as well<br>as internal metrics, that Google<br>maintains as confidential in the<br>ordinary course of its business and<br>is not generally known to the<br>public or Google's competitors.<br>Such confidential and proprietary<br>information reveals Google's<br>internal strategies, system designs,<br>and business practices for<br>operating and maintaining many of<br>its important services, and falls<br>within the protected scope of the<br>Protective Order entered in this<br>action. See Dkt. 81 at 2-3. Public<br>disclosure of such confidential and<br>proprietary information could<br>affect Google's competitive<br>standing as competitors may alter<br>their systems and practices relating<br>to competing products. It may also<br>place Google at an increased risk<br>of cybersecurity threats, as third<br>parties may seek to use the<br>information to compromise<br>Google's internal practices relating<br>to competing products. |
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| 22 | Mao Decl., Exhibit 22<br>(GOOG-BRWN-00845281) | GRANTED as to the<br>portions at: | The information requested to be<br>sealed contains Google's highly<br>confidential and proprietary<br>information regarding highly<br>sensitive features of Google's<br>internal systems and operations,<br>including various types of<br>Google's internal projects, data<br>signals and logs and their<br>proprietary functionalities, as well<br>as internal metrics, that Google   |
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|   |   | <p>maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p> |
| <p>Mao Decl., Exhibit 23<br/>(GOOG-BRWN-00845275)</p> | <p>GRANTED as to the portions at:</p> <p>Entirety</p> | <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this</p>  |



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|   |  | action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  |
| Mao Decl., Exhibit 24<br>(GOOG-BRWN-00845274) | GRANTED as to the portions at:<br><br>Entirety | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and links to internal documents, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |

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| <p>Mao Decl., Exhibit 25<br/>(GOOG-CABR-03668216)</p> | <p>GRANTED as to the<br/>portions at:</p> <p>Entirety</p> | <p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various types of Google’s internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p> |
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**SO ORDERED.**

DATED: \_\_\_\_\_

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HON. SUSAN VAN KEULEN  
United States Magistrate Judge